

Exhibit A

April – May Invoice



PACHULSKI
STANG
ZIEHL &
JONES

919 North Market Street
17th Floor
Wilmington, DE 19801

May 31, 2025

Invoice 147254

Client 46699.00002

JoAnn O.C.C.

-

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2025

FEES	\$61,373.50
EXPENSES	\$433.50
TOTAL CURRENT CHARGES	\$61,807.00
BALANCE FORWARD	\$338,447.46
LAST PAYMENT	-\$271,423.26
TOTAL BALANCE DUE	\$128,831.20

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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BJS	Sandler, Bradford J.	Partner	1,895.00	8.40	\$15,918.00
JEO	O'Neill, James E.	Partner	1,475.00	20.20	\$29,795.00
ATB	Bates, Andrea T.	Paralegal	650.00	23.50	\$15,275.00
PEC	Cuniff, Patricia E.	Paralegal	625.00	0.30	\$187.50
CJB	Bouzoukis, Charles J.	Case Management Assistant	495.00	0.40	\$198.00
JG	Janet Grayson	Case Management Assistant	0.00	51.80	\$0.00
			<hr/> 104.60		<hr/> \$61,373.50

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition	2.00	\$3,790.00
BL	Bankruptcy Litigation	2.20	\$3,245.00
CA	Case Administration	7.10	\$7,928.50
CO	Claims Administration and Objections	2.30	\$4,358.50
CP	PSZJ Compensation	12.10	\$9,393.50
CPO	Other Professional Compensation	14.30	\$14,291.50
EC	Contract and Lease Matters	1.10	\$1,622.50
FN	Financing/Cash Collateral/Cash Management	0.40	\$590.00
HE	Hearings	53.50	\$1,448.00
OP	Operations	0.10	\$189.50
PD	Plan and Disclosure Statement	9.00	\$13,569.00
RFS	Relief from Stay	0.50	\$947.50
		<hr/> 104.60	<hr/> \$61,373.50

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Litigation Support Vendors	\$71.10
Pacer - Court Research	\$233.10
Postage	\$53.10
Reproduction Expense	\$76.20
	<hr/>
	\$433.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Disposition						
05/07/2025	BJS	AD	Review Cotton Mill objection	0.10	1,895.00	\$189.50
05/12/2025	BJS	AD	Review RPT objection	0.10	1,895.00	\$189.50
05/12/2025	BJS	AD	Review Objection of CI Warner	0.10	1,895.00	\$189.50
05/12/2025	BJS	AD	Review Inland's objection	0.10	1,895.00	\$189.50
05/12/2025	BJS	AD	Review DKS's objection	0.10	1,895.00	\$189.50
05/12/2025	BJS	AD	Review Myrtle Beach Farms' objection	0.10	1,895.00	\$189.50
05/12/2025	BJS	AD	Review Cavender Stores' objection	0.10	1,895.00	\$189.50
05/14/2025	BJS	AD	Attention to assumed contracts	0.10	1,895.00	\$189.50
05/15/2025	BJS	AD	Review Alameda's objection	0.10	1,895.00	\$189.50
05/16/2025	BJS	AD	Attention to claim objections	0.20	1,895.00	\$379.00
05/16/2025	BJS	AD	Review Continental's objection	0.10	1,895.00	\$189.50
05/21/2025	BJS	AD	Review amended objection regarding Wolf Creek	0.10	1,895.00	\$189.50
05/23/2025	BJS	AD	Attention to sale/assume contracts	0.20	1,895.00	\$379.00
05/24/2025	BJS	AD	Attention to assumed leases	0.10	1,895.00	\$189.50
05/28/2025	BJS	AD	Review Suburban Plaza's objection	0.10	1,895.00	\$189.50
05/29/2025	BJS	AD	Review COC regarding CBTS lease	0.10	1,895.00	\$189.50
05/30/2025	BJS	AD	Attention to lease assumptions	0.10	1,895.00	\$189.50
05/31/2025	BJS	AD	Review LNN's objection	0.10	1,895.00	\$189.50
				2.00		\$3,790.00
Bankruptcy Litigation						
05/01/2025	JEO	BL	Review entered court orders	0.30	1,475.00	\$442.50
05/14/2025	JEO	BL	Review status of pending matters	1.00	1,475.00	\$1,475.00
05/16/2025	JEO	BL	Review status of pending matters	0.90	1,475.00	\$1,327.50
				2.20		\$3,245.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Case Administration						
04/01/2025	ATB	CA	Review docket (.2); update critical dates memo (.3); correspond with calendaring team re: same (.1).	0.60	650.00	\$390.00
04/17/2025	ATB	CA	Review docket (.2); update critical dates memo (.2).	0.40	650.00	\$260.00
04/17/2025	BJS	CA	Review critical dates and discuss with A.Bates	0.10	1,895.00	\$189.50
04/21/2025	ATB	CA	Review docket and update critical dates memo.	0.60	650.00	\$390.00
04/22/2025	ATB	CA	Update critical dates memo.	0.20	650.00	\$130.00
04/23/2025	JEO	CA	Review pending matters	1.00	1,475.00	\$1,475.00
04/29/2025	JEO	CA	Review omnibus order scheduling hearings	0.10	1,475.00	\$147.50
04/30/2025	BJS	CA	Review Amended Agenda and discuss with J. O'Neill	0.10	1,895.00	\$189.50
04/30/2025	JEO	CA	Review agenda canceling 5/8 hearing	0.20	1,475.00	\$295.00
05/06/2025	ATB	CA	Update critical dates memo.	0.30	650.00	\$195.00
05/09/2025	ATB	CA	Review docket (.2); updated critical dates memo (.3).	0.50	650.00	\$325.00
05/21/2025	BJS	CA	Review Committee Materials regarding investigation	0.30	1,895.00	\$568.50
05/22/2025	BJS	CA	Committee Call and review Province report	1.00	1,895.00	\$1,895.00
05/23/2025	ATB	CA	Review docket and update critical dates memo and calendar; circulate to team.	0.60	650.00	\$390.00
05/23/2025	BJS	CA	Review critical dates and discuss with A.Bates	0.10	1,895.00	\$189.50
05/27/2025	ATB	CA	Correspond with team regarding cancellation of 5/28 hearing.	0.20	650.00	\$130.00
05/27/2025	BJS	CA	Review amended agenda and discuss with J. O'Neill	0.10	1,895.00	\$189.50
05/30/2025	ATB	CA	Review docket (.2); update critical dates memo (.3); circulate to team (.1).	0.60	650.00	\$390.00
05/30/2025	BJS	CA	Review critical dates and discuss with A.Bates	0.10	1,895.00	\$189.50
				7.10		\$7,928.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Claims Administration and Objections						
04/11/2025	BJS	CO	Various emails with W Weidenbacher regarding claims	0.30	1,895.00	\$568.50
04/14/2025	BJS	CO	Various emails with S Kaufman regarding tax claims	0.10	1,895.00	\$189.50
04/28/2025	BJS	CO	Review Steelworkers' settlement	0.30	1,895.00	\$568.50
04/30/2025	BJS	CO	Attention to rejection damage claims	0.20	1,895.00	\$379.00
05/06/2025	BJS	CO	Review U-Blaine Properties objection	0.10	1,895.00	\$189.50
05/08/2025	BJS	CO	Review Real Sub objection	0.20	1,895.00	\$379.00
05/12/2025	BJS	CO	Review WLPX's objection	0.10	1,895.00	\$189.50
05/12/2025	BJS	CO	Review Younger Partners Investment's objection	0.10	1,895.00	\$189.50
05/14/2025	BJS	CO	Review Bayfield's objection	0.10	1,895.00	\$189.50
05/15/2025	BJS	CO	Telephone conference with D Easton regarding 503b9 claims	0.30	1,895.00	\$568.50
05/16/2025	BJS	CO	Review National Realty's objection	0.10	1,895.00	\$189.50
05/19/2025	BJS	CO	Various email with Committee regarding claim recon	0.10	1,895.00	\$189.50
05/21/2025	BJS	CO	Attention to Cotton Mill's claim	0.10	1,895.00	\$189.50
05/29/2025	BJS	CO	Attention to Myrtle Beach Farms objection	0.20	1,895.00	\$379.00
				2.30		\$4,358.50
PSZJ Compensation						
04/14/2025	JEO	CP	Review and finalize PSZJ first monthly fee application	0.50	1,475.00	\$737.50
04/15/2025	ATB	CP	Review Feb prebill.	0.60	650.00	\$390.00
04/21/2025	ATB	CP	Revise PSZJ first monthly fee statement.	1.00	650.00	\$650.00
04/21/2025	ATB	CP	Review exhibit to March bill.	0.60	650.00	\$390.00
04/21/2025	JEO	CP	Review and finalize First Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP as Co-Counsel for the Official Committee	0.40	1,475.00	\$590.00
04/22/2025	ATB	CP	Draft PSZJ March fee application.	0.80	650.00	\$520.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/22/2025	JEO	CP	Review and finalize PSZJ March fee application	0.50	1,475.00	\$737.50
04/29/2025	ATB	CP	Draft first interim fee application for 1/31/25 - 3/31/25.	2.00	650.00	\$1,300.00
04/29/2025	ATB	CP	Revise professionals' fee chart.	0.30	650.00	\$195.00
05/12/2025	ATB	CP	Review April bill (.3); correspond with J. O'Neill re: same (.1).	0.40	650.00	\$260.00
05/12/2025	ATB	CP	Draft CNOs re: PSZJ Feb and March monthlies (.4); file same (.3).	0.70	650.00	\$455.00
05/13/2025	ATB	CP	Revisions to PSZJ first interim fee application; correspond with co-counsel re: same.	0.90	650.00	\$585.00
05/13/2025	ATB	CP	File CNO re: PSZJ March fee application; correspond with J. O'Neill re: same.	0.30	650.00	\$195.00
05/15/2025	ATB	CP	Correspond with J. O'Neill re: filing of first interim fee applications (.4); revise PSZJ application (.4) ; draft notice of hearing re: same (.3) ; file and serve same (.3).	1.40	650.00	\$910.00
05/15/2025	BJS	CP	Review and revise fee app	0.30	1,895.00	\$568.50
05/16/2025	ATB	CP	Draft notice of hearing regarding Committee professionals first interim fee application (.3); correspond with J. O'Neill and co-counsel regarding same (.3); file and serve same (.4).	1.00	650.00	\$650.00
05/29/2025	ATB	CP	Organize ledes files for PSZJ Feb and March fee applications; forward same to UST office.	0.40	650.00	\$260.00
				12.10		\$9,393.50

Other Professional Compensation

04/14/2025	JEO	CPO	Review and finalize Province Interim Fee application	0.40	1,475.00	\$590.00
04/15/2025	JEO	CPO	Review status of fee applications	0.50	1,475.00	\$737.50
04/16/2025	BJS	CPO	Review K&E fee app	0.10	1,895.00	\$189.50
04/21/2025	BJS	CPO	Review Centerview Partners fee app	0.10	1,895.00	\$189.50
04/29/2025	ATB	CPO	Draft notice for Province first monthly fee statement; review fee statement; file and serve same.	0.70	650.00	\$455.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/29/2025	JEO	CPO	Review and finalize Monthly Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors for the period January 30, 2025 to February 28, 2025	0.40	1,475.00	\$590.00
05/05/2025	ATB	CPO	Review, file and serve Kelly Drye first combined monthly fee application.	0.60	650.00	\$390.00
05/05/2025	JEO	CPO	Review and finalize fee application	0.40	1,475.00	\$590.00
05/05/2025	JEO	CPO	Review and finalize Monthly Application for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Lead Counsel to the Official Committee of Unsecured Creditors for the period January 30, 2025 to February 28, 2025	0.40	1,475.00	\$590.00
05/06/2025	ATB	CPO	Revise, file and serve Province March monthly.	0.70	650.00	\$455.00
05/06/2025	BJS	CPO	Review Province fee app	0.10	1,895.00	\$189.50
05/06/2025	JEO	CPO	Review and finalize fee application for Province	0.40	1,475.00	\$590.00
05/07/2025	BJS	CPO	Review Cole Schotz fee app	0.10	1,895.00	\$189.50
05/08/2025	ATB	CPO	Review; file and serve Kelley Drye March fee statement.	0.70	650.00	\$455.00
05/12/2025	ATB	CPO	Draft CNO re: province Feb monthly (.3); correspond with Province re: same.	0.50	650.00	\$325.00
05/12/2025	BJS	CPO	Review K&E fee app	0.10	1,895.00	\$189.50
05/15/2025	ATB	CPO	Correspond with Kelley Drye re: filing of Committee's first interim fee applications (.4); draft notice of hearing re: Province application (.3); finalize and file and serve same (.6).	1.30	650.00	\$845.00
05/15/2025	BJS	CPO	Review KDW fee app	0.10	1,895.00	\$189.50
05/15/2025	BJS	CPO	Review Province fee app	0.10	1,895.00	\$189.50
05/15/2025	JEO	CPO	Review issues related to interim fee applications for committee professionals.	1.00	1,475.00	\$1,475.00
05/16/2025	JEO	CPO	Review notice for fee hearing	0.60	1,475.00	\$885.00
05/19/2025	ATB	CPO	Update Committee professionals' fee chart.	0.30	650.00	\$195.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/20/2025	ATB	CPO	Draft CNO for Province's first monthly fee statement; correspond with Province re: same.	0.40	650.00	\$260.00
05/21/2025	ATB	CPO	Draft CNO re: Province first monthly; correspond with S. Kietlinski re: same; file same.	0.50	650.00	\$325.00
05/28/2025	ATB	CPO	Draft and file CNO re: Kelley Drye's March monthly.	0.40	650.00	\$260.00
05/28/2025	ATB	CPO	Draft CNOs re: Kelley Drye's first and second monthlies (.3); correspond with J. Churchill re: same (.2).	0.50	650.00	\$325.00
05/28/2025	ATB	CPO	Draft and file CNO's re: Province's Feb and March monthlies.	0.60	650.00	\$390.00
05/29/2025	ATB	CPO	Draft CNO re: Province March fee application (.2); correspond with S. Kietlinski re: same (.1); file CNO (.1); update Province April fee application (.2); correspond with S. Kietlinski re: same (.1).	0.70	650.00	\$455.00
05/29/2025	JEO	CPO	Review status of Province monthly fee application and approve CNO for filing	0.30	1,475.00	\$442.50
05/30/2025	ATB	CPO	Review and file Province's April monthly fee statement (.4); draft CNO re: Province March monthly (.1); correspond with Province re: same and file (.2).	0.70	650.00	\$455.00
05/30/2025	JEO	CPO	Review status of KDW fee application and approve CNO for filing	0.30	1,475.00	\$442.50
05/30/2025	JEO	CPO	Review and finalize monthly fee application for Province	0.30	1,475.00	\$442.50
				14.30		\$14,291.50

Contract and Lease Matters

04/15/2025	JEO	EC	Review and respond to email from Landlord lawyer re status	0.30	1,475.00	\$442.50
04/30/2025	JEO	EC	Review rejection notices	0.80	1,475.00	\$1,180.00
				1.10		\$1,622.50

Financing/Cash Collateral/Cash Management

04/01/2025	JEO	FN	Review further interim DIP order	0.40	1,475.00	\$590.00
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				0.40		\$590.00
Hearings						
05/01/2025	PEC	HE	Review Agenda for 5/6/25 Hearing and circulate	0.10	625.00	\$62.50
05/19/2025	PEC	HE	Review Agenda canceling 5/21/25 Hearing and circulate	0.20	625.00	\$125.00
05/21/2025	JG	HE	Prepare hearing and virtual notebook for hearing on 05-28-25..	0.50	0.00	N/C
05/22/2025	JG	HE	Prepare hearing notebook for hearing 05/28/25.	50.00	0.00	N/C
05/23/2025	ATB	HE	Circulate agenda for 5/28 hearing; coordinate hearing binders for team.	0.50	650.00	\$325.00
05/23/2025	CJB	HE	Prepare hearing binders for hearing on 5/28/25.	0.40	495.00	\$198.00
05/23/2025	JG	HE	Prepare hearing notebook for hearing on 5/28/25.	1.30	0.00	N/C
05/27/2025	JEO	HE	Review agenda canceling hearing	0.20	1,475.00	\$295.00
05/27/2025	JEO	HE	Email to co-counsel regarding status of 5/28 hearing	0.30	1,475.00	\$442.50
				53.50		\$1,448.00
Operations						
04/25/2025	BJS	OP	Review MORs	0.10	1,895.00	\$189.50
				0.10		\$189.50
Plan and Disclosure Statement						
04/03/2025	JEO	PD	Review draft plan	1.00	1,475.00	\$1,475.00
04/08/2025	JEO	PD	Prepare for confirmation hearing	2.00	1,475.00	\$2,950.00
04/11/2025	JEO	PD	Participate in hearing regarding court's confirmation decision	1.00	1,475.00	\$1,475.00
04/15/2025	JEO	PD	Review proposed confirmation order	0.60	1,475.00	\$885.00
04/15/2025	JEO	PD	Review revised plan	0.80	1,475.00	\$1,180.00
05/05/2025	BJS	PD	Review amended plan and Disclosure Statement	0.50	1,895.00	\$947.50

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05/07/2025	JEO	PD	Review amended plan and disclosure statement	2.00	1,475.00	\$2,950.00
05/27/2025	BJS	PD	Attention to Disclosure Statement Order	0.10	1,895.00	\$189.50
05/27/2025	BJS	PD	Various email with J McLoughlin regarding plan update	0.10	1,895.00	\$189.50
05/27/2025	JEO	PD	Review amended plan and disclosure statement	0.90	1,475.00	\$1,327.50
				9.00		\$13,569.00
Relief from Stay						
04/08/2025	BJS	RFS	Review OOCL's Motion for Relief	0.10	1,895.00	\$189.50
04/29/2025	BJS	RFS	Review COC regarding OOCL	0.10	1,895.00	\$189.50
04/30/2025	BJS	RFS	Review Ocean Network's motion	0.20	1,895.00	\$379.00
05/30/2025	BJS	RFS	Review COC regarding Brown Stay Relief motion	0.10	1,895.00	\$189.50
				0.50		\$947.50
TOTAL SERVICES FOR THIS MATTER:						\$61,373.50

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Expenses

02/13/2025	OS	Advita overtime, Justin Morton (1.87)	56.10
02/14/2025	OS	Advita overtime, Terrance Jones (0.5)	15.00
04/04/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
04/29/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
04/29/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
04/29/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
04/29/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
04/29/2025	RE	SCAN/COPY (4 @0.10 PER PG)	0.40
04/29/2025	RE	SCAN/COPY (50 @0.10 PER PG)	5.00
04/29/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
04/29/2025	RE	SCAN/COPY (11 @0.10 PER PG)	1.10
04/29/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
04/29/2025	RE	SCAN/COPY (19 @0.10 PER PG)	1.90
04/29/2025	RE	SCAN/COPY (33 @0.10 PER PG)	3.30
04/29/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
04/29/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
04/29/2025	RE	SCAN/COPY (4 @0.10 PER PG)	0.40
04/29/2025	RE	SCAN/COPY (4 @0.10 PER PG)	0.40
04/29/2025	RE	SCAN/COPY (36 @0.10 PER PG)	3.60
04/29/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
04/29/2025	RE	SCAN/COPY (3 @0.10 PER PG)	0.30
05/16/2025	PO	Postage	53.10
05/16/2025	RE	(2 @0.20 PER PG)	0.40
05/16/2025	RE	SCAN/COPY (1 @0.10 PER PG)	0.10
05/16/2025	RE	SCAN/COPY (26 @0.10 PER PG)	2.60
05/16/2025	RE	SCAN/COPY (5 @0.10 PER PG)	0.50
05/16/2025	RE	SCAN/COPY (1 @0.10 PER PG)	0.10
05/16/2025	RE	SCAN/COPY (120 @0.10 PER PG)	12.00

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05/21/2025	RE	SCAN/COPY (4 @0.10 PER PG)	0.40
05/21/2025	RE	SCAN/COPY (140 @0.10 PER PG)	14.00
05/21/2025	RE	SCAN/COPY (13 @0.10 PER PG)	1.30
05/21/2025	RE	SCAN/COPY (5 @0.10 PER PG)	0.50
05/21/2025	RE	SCAN/COPY (1 @0.10 PER PG)	0.10
05/23/2025	RE	(2 @0.20 PER PG)	0.40
05/23/2025	RE	SCAN/COPY (2 @0.10 PER PG)	0.20
05/23/2025	RE	SCAN/COPY (70 @0.10 PER PG)	7.00
05/23/2025	RE	SCAN/COPY (64 @0.10 PER PG)	6.40
05/23/2025	RE	SCAN/COPY (48 @0.10 PER PG)	4.80
05/23/2025	RE	SCAN/COPY (60 @0.10 PER PG)	6.00
05/31/2025	PAC	Pacer - Court Research	233.10

Total Expenses for this Matter

\$433.50

Pachulski Stang Ziehl & Jones LLP
JoAnn O.C.C.
Client 46699.00002

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Invoice 147254
May 31, 2025

A/R STATEMENT

Outstanding Balance from prior invoices as of 05/31/2025			(May not include recent payments)	
<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fee Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
146128	02/28/2025	\$62,270.50	\$0.00	\$62,270.50
146419	03/31/2025	\$4,753.70	\$0.00	\$4,753.70
Total Amount Due on Current and Prior Invoices:				\$128,831.20